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8 **Attorneys for Defendant**
9 **GARY GOULIN**

10
11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13

11 THE UNITED STATES OF	}	CASE NO.: 22-CR-00476-MEMF <i>EX PARTE</i> APPLICATION TO ALLOW DEFENDANT GARY GOULIN TO TRAVEL TO WASHINGTON, D.C.; [PROPOSED] ORDER
12 AMERICA,		
13 Plaintiff,		
14 vs.		
15 GARY GOULIN,		
16 Defendant		

17
18 Defendant Gary Goulin, by and through his counsel, Mark J. Werksman,
19 hereby applies *Ex Parte* to be allowed to travel to Washington, D.C. for the funeral
20 of his husband's sister who has terminal metastatic uterine cancer and may pass at
21 any time. This request is being made in advance, as the family is Jewish and
22 funerals for the deceased must be conducted within 48 hours of their passing.

23 All other terms of Mr. Goulin's pre-trial release shall remain intact with the
24 exception of a curfew. However, Mr. Goulin shall continue electronic monitoring
25 with an ankle bracelet while traveling, provide 24 hours-notice with a complete
26 itinerary to pre-trial services prior to departure, and report to pre-trial services
27 within 24 hours of his return to Los Angeles.

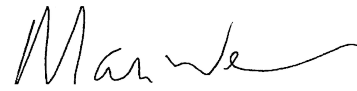
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1 Assistant United States Attorney Sarah Lee does not object to his request.
2 Pre-trial Services Officers Ileen Rodriguez and Gregory Kwon do not object to this
3 request.
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5 Dated: March 28, 2023

Werksman Jackson & Quinn LLP

6
7 By:



8 Mark J. Werksman
9 Attorney for Defendant
10 Gary Goulin
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DECLARATION OF MARK J. WERKSMAN

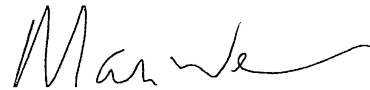
I, Mark J. Werksman, declare as follows:

1. I am counsel of record for defendant Gary Goulin in the case of *United States v. Gary Goulin*, Case Number: 22-CR-00476-MEMF;

2. The facts contained within this Application are true and correct to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28th day of March, 2023, at Los Angeles, California.



Mark J. Werksman
Declarant